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7 Attorneys for
8 ANGELA RAMIREZ

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10 **UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA,**
11
12 **SAN FRANCISCO DIVISION**
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14 In re PG&E CORPORATION & PACIFIC
15 GAS & ELECTRIC COMPANY, Debtors

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18 ANGELA RAMIREZ, Creditor and Moving
19 Party v. PACIFIC GAS & ELECTRIC
20 COMPANY Debtor & Responding Party
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23 ☐ Affects PG&E Corporation
24 ☒ Affects Pacific Gas and Electric Company
25 ☐ Affects both Debtors
26 *All papers shall be filed in the Lead Case,
27 No. 19-30088-DM,
28 _____

Bankruptcy Case No. 19-30088-DM

Chapter 11
Lead Case, Jointly Administered

**DECLARATION OF DOW W. PATTEN
IN SUPPORT OF MOTION FOR
RELIEF FROM AUTOMATIC STAY**

Response Deadline:
March 1, 2022, 4:00 p.m. (PT)

Hearing Information If Timely Response
Made:

Date: March 15, 2022

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances
Only)

Dept: Courtroom 17, 16th Floor 450 Golden
Gate Avenue San Francisco, CA 94102

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30 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN, PLEASE
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32 TAKE NOTICE that on March 15, 2022 at 10:00 a.m. in Courtroom 17 of the above-entitled
33
34 Court located at 450 Golden Gate Avenue, 16th Floor, Creditor Angela Ramirez will and hereby
35
36 does move the Court for an Order Granting Relief from Automatic Stay. The Motion is based on
37
38

1 this Notice of Motion and Motion, the Memorandum of Points and Authorities filed herewith,
2 and Declaration of Dow W. Patten in support.

3 The grounds for the motion are that Creditor Angela Ramirez's Complaint relates to
4 conduct and adverse employment actions that occurred after the filing of this Chapter 11 case,
5 and the balance of interests weigh in favor of that matter proceeding in Sacramento Superior
6 Court.
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8 Respectfully submitted this 16th day of February, 2022

9 FORTHRIGHT LAW, P.C.

10 /s/ Dow W. Patten
11 DOW W. PATTEN
12 Attorneys for Angela Ramirez
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